

**ORDERED SEALED BY COURT***unsealed 5/1/08 ap*

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U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

BY:

*[Signature]*

DEPUTY

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

January 2007 Grand Jury

10	UNITED STATES OF AMERICA,	)	Criminal Case No. <b>08 CR 1763</b>	<b>JLS</b>
11		)		
12	Plaintiff,	)	<u>I N D I C T M E N T</u>	
13	v.	)	Title 18, U.S.C., Sec. 1015(a) -	
14	SHEHADEH SAMIRA,	)	Naturalization Fraud; Title 18,	
15	Defendant.	)	U.S.C., Sec. 1425(a) - Procuring	
		)	Naturalization by Fraud; Title 18,	
		)	U.S.C., Sec. 1546(a) - Visa Fraud	

The grand jury charges:

Count 1

On or about April 6, 2006, defendant SHEHADEH SAMIRA, within the Southern District of California, knowingly made a false statement under oath in a case, proceeding, and matter relating to, and under and by virtue of any law of the United States relating to naturalization, citizenship and registry of aliens in that defendant SHEHADEH SAMIRA provided a false answer to question 23 of his Application for Naturalization (N-400); in violation of Title 18, United States Code, Section 1015(a).

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Count 2

On or about April 6, 2006, defendant SHEHADEH SAMIRA, within the Southern District of California, did knowingly procure, and attempt to procure, contrary to law, naturalization of himself, and documentary and other evidence of naturalization and of citizenship in that defendant SHEHADEH SAMIRA provided a false answer to question 23 of his Application for Naturalization (N-400); in violation of Title 18, United States Code, Section 1425(a).

Count 3

On or about April 6, 2006, within the Southern District of California, defendant SHEHADEH SAMIRA, did possess, utter, and use a document prescribed by statute and regulation for entry into and as evidence of authorized stay and employment in the United States, to wit, an Alien Registration Receipt Card, [Form I-551], knowing it to have been procured by means of any false claim, false statement, to have been otherwise procured by fraud, and unlawfully obtained in that it was issued based upon an application to register permanent residence or adjust status [Form I-485], which contained a material statement, to wit, that he had never by fraud and misrepresentation of material fact ever procured any immigration benefit; which the defendant then and there knew was false; in violation of Title 18, United States Code, Section 1546(a).

DATED: May 29, 2008.

A TRUE BILL:

Shane R. Lyon  
Foreperson

KAREN P. HEWITT  
United States Attorney

By: Caroline P. Han  
CAROLINE P. HAN  
Assistant U.S. Attorney